

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

**Lasheena Sipp-Lipscomb and Andres  
Gardin, Sr., Individually and in their own  
right and as Parents and Natural  
Guardians of A G, Jr., a Minor**

**v.**

**Einstein Physicians Pennypack Pediatrics,  
*et al.***

**Civil Action No. 2:20-cv-01926-MMB**

**PLAINTIFFS' AMENDED EXHIBIT LIST  
(ATTACHED AS EXHIBIT A)**

JOKELSON LAW GROUP, P.C.

Date: November 1, 2022

By: s/David E. Jokelson  
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*Attorneys for Plaintiffs*

## EXHIBIT A

## PLAINTIFFS' AMENDED EXHIBIT LIST

Sipp-Lipscomb, et al. v. Einstein Physicians Pennypack Pediatrics, et al.  
 USDC for the Eastern District of Pennsylvania, Civil Action No. 20-cv-01926

EX. No	DATE	DESCRIPTION
<b>DEPOSITION EXHIBITS MARKED BY PLAINTIFF</b>		
1	07/24/19	Audit Data
2	07/24/19	Audit Data
3	07/24/19	Entry Page Screenshot
4	07/24/19	Tech Comments
5	08/07/20	Teleradiology Solutions Website
6	07/24/19	Preliminary Ultrasound Report (Teleradiology Solutions)
7	07/24/19	Final Ultrasound Report (Timothy Higgins)
8	07/06/05	ACR Practice Parameter for Communication of Diagnostic Imaging Findings
9	08/07/20	Quality and Safety in Radiology _JC Accredited Teleradiology Provider Teleradiology Solutions
10	07/24/19	ED Note 0334
11	07/24/19	Chart Access Log
12	07/24/19	Teleradiology Solutions Preliminary Report
13	07/24/19	Consultation Report
	07/24/19	Discharge Summary
15	07/24/19	ED Triage
16	07/06/05	Emergency Room On-Call Agreement
17		July 2019 Time Log for On-Call Services
18		Bartkus LinkedIn
19		RDMS Registered Diagnostic Medical Sonographer _ ARDMS
20		Pediatric Sonography Certification _ Take Exam Online _ ARDMS
21	07/08/21	Jokelson to Counsel enc Third Amended NOD of Hayley Bartkus, etc.
22	07/22/21	Robinson to Jokelson - update to plaintiffs' counsel
23	07/24/19	Tech Comments
24	07/24/19	Quality Assurance Report
25	07/24/19	QA Response Metadata
26		July 23, 2019 - July 25, 2019 T-Mobile Request Submission Response
27	07/07/21	Amended Notice of Deposition - CD of Einstein Physicians
28	09/02/20	Einstein's Initial Disclosures
29	06/18/20	Zack to Jokelson enc partial responses to RPD
30	12/20/20	Objections and Responses of Defendants Einstein to RPD
31		CV of Erica Poletto, MD (from Poletto Dep)
32		Quality Assurance (Poletto dep)
33		TRS RADSPA QA WORKFLOW (Poletto dep)
34	09/02/21	Notice of Deposition of Erica Poletto
35		Peer Review
36		Medical Staff Bylaws of St. Christopher's Hospital for Children
37		Policy/Procedure - Interpretation of Images
38		Metadata Info of Your File
39		Policy/Procedure - Direct Communication of Abnormal or Urgent Results
40		Metadata Info of Your File
41	05/01/05	Position Description/Performance Review
42	07/24/19	Exam Record Access Report
43	07/24/19	Exam Record Access Report
44	07/18/21	RIS Photos
45		Teleradiology Solutions Accuracy Summary
46		Schmitt Manual Extract
47		Schmitt Manual Extract

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EX. No	DATE	DESCRIPTION
48		Schmitt Manual Extract
49		Schmitt Manual Extract
<b>DEPOSITION TRANSCRIPT (SUBJECT TO PLAINTIFFS' OBJECTIONS)</b>		
51	03/22/21	Deposition Transcript of Lasheena Sipp-Lipscomb (Volume 1)
52	06/04/21	Deposition Transcript of Lasheena Sipp-Lipscomb (Volume 2)
53	03/22/21	Deposition Transcript of Andres Gardin
54	06/23/21	Deposition Transcript of Pam Brown
55	11/01/21	Deposition Transcript of Allyson McDonnell, RN
56	11/01/21	Deposition Transcript of Frances Barlow, RN
57	11/01/21	Deposition Transcript of Patricia Madison, RN
58	06/23/21	Deposition Transcript of Hayley Bartkus
59	06/15/21	Deposition Transcript of Erin Hassel, MD
60	06/15/21	Deposition Transcript of Pramath Nath, MD
61	06/29/21	Deposition Transcript of Charles Concodora, MD
62	05/26/21	Deposition Transcript of Eric Cho, MD
63	05/03/21	Deposition Transcript of Arjun Kalyanpur, MD
64	09/22/21	Deposition Transcript of Erica Poletto, MD (Volume 1)
65	12/21/21	Deposition Transcript of Erica Poletto, MD (Volume 2)
<b>MEDICAL RECORDS</b>		
66		Einstein Physicians Pennypack Pediatrics Obtained by Plaintiff
<b>OTHER EVIDENCE</b>		
67	11/01/21	Tricia Hayes Affidavit (ECF No. 143)
68	11/18/21	Tricia Hayes Affidavit (ECF No. 153)
69	12/02/21	Tricia Hayes Affidavit - Revised
70	10/28/21	2021-10-28 Samms to Jokelson
71	12/02/21	2021-12-02 Samms to Jokelson
72		Objection by Urology w-Exhibits
73		Order Approving and Attaching SCHC Purchase Agreement
74		Pediatric Telephone Protocols 16th Edition (Barton D. Schmitt, MD, FAAP)
<b>PLAINTIFFS' EXPERTS</b>		
75	12/18/21	Report of Daniel Rauch, MD, FAAP
76		Curriculum Vitae of Daniel Rauch, MD, FAAP
77	08/30/21	Report of Pasquale Patrizio, MD, MBE, HCLD
78	03/02/22	Rebuttal Report of Pasquale Patrizio, MD, MBE, HCLD
79		Curriculum Vitae of Pasquale Patrizio, MD, MBE, HCLD
80	12/17/21	Report of Richard L. Markowitz, MD, FACR
81		Curriculum Vitae of Richard L. Markowitz, MD, FACR
82	12/14/21	Report of Pasquale Casale, MD, MHA
83	03/03/22	Rebuttal Report of Pasquale Casale, MD, MHA
84		Curriculum Vitae of Pasquale Casale, MD, MHA
<b>PHOTOGRAPHS</b>		
85	11/18/21	GE RIS System Photographs
<b>PLEADINGS</b>		
86	12/23/20	Plaintiff's Second Amended Complaint (SAC) with Exhibits (ECF No. 87)

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EX. No	DATE	DESCRIPTION
87	01/12/21	Einstein Answer to SAC w-Aff Def (ECF No. 88)
88	01/13/21	St. Christopher's Hospital for Children, et al Answer w-Aff Def to SAC (ECF No. 91)
89	01/14/21	Kalyanpur and Teleradiology Solutions Answer w-Aff Def to SAC (ECF No. 92)
90	01/22/21	Cho Answer w-Aff Def to SAC (ECF No. 93)
91	01/22/21	Concodora & Urology for Children Answer w-Aff Def to SAC (ECF No. 94)
92	10/12/21	Order re Motion to Compel (ECF No. 134)
93	11/18/21	St. Christopher's Response in Opposition to Plaintiffs' Motion to Enforce (ECF No. 150)
<b>DEFENDANTS' WRITTEN DISCOVERY RESPONSES</b>		
94	06/10/21	Concordora and Urology Responses to Rogs and RPD (Affirmative Defenses)
95	02/01/21	Cho Response to Plaintiffs' RPD
96	04/15/21	Cho Responses to Plaintiffs' Interrogatories and RPD (Affirmative Defenses)
97	05/27/21	Einstein Responses to Plaintiffs' Interrogatories and RPD (Affirmative Defenses)
98	07/10/20	St. Chris, et al. Response to Plaintiffs' RPD
99	09/30/20	St. Chris, et al. Response to Plaintiffs RPD, Nos 10 to 37
100	05/27/21	St. Chris, et al. Responses to Plaintiffs' Interrogatories and RPD (Affirmative Defenses)
101	10/29/20	Bartkus Responses to Plaintiffs' RPD
102	02/24/21	Kalyanpur, et al. Objections and Responses to Plaintiffs' RPD
103	03/11/21	Kalyanpur, et al. Supplemental Responses to Plaintiffs RPD
104	05/28/21	Kalyanpur, et al. Supplemental Responses to Discovery Pursuant to Deposition
105	06/02/21	Kalyanpur, et al. Objections and Responses to Plaintiffs Interrogatories and RPD (Affirmative Defenses)
106	09/10/21	Kalyanpur, et al. Responses to Plaintiffs' Supplemental RPD
<b>DEFENDANTS' DOCUMENT PRODUCTIONS</b>		
107		Eric Cho, MD Curriculum Vitae
108		Urology for Children Chart
109	05/20/20	UFC ED On Call Panel Agreement (redacted) (2)
110		UFC Extension for ER with St. Chris 5.20.20
111		Section Chief Agreement (Redacted)
112	03/09/21	Email Young and Jokelson
113	06/11/21	Email Young and Jokelson
114	07/21/21	Email Young and Jokelson
115	10/20/21	Email from George Young re User IDs
116		Teleradiology Solutions Policy 01.03
117		Arjun Kalyanpur, MD Curriculum Vitae
118		Arjun Kalyanpur MD Schedule
119		Teleradiology Solutions Services Agreement
120		Teleradiology Solutions Audit Protocol
121		Gardin Bates Stamped SCHC Records
122	07/01/19	Bartkus Call Schedule_Redacted
123	07/22/21	Robinson to Jokelson - update to plaintiffs' counsel
124	12/01/21	Samms Email enc Policies
125	07/24/19	Exam Record Access Report 5544216
126		CD ROM of Ultrasound
<b>PLAINTIFF'S DOCUMENT PRODUCTIONS</b>		
127		St. Chris Records Obtained by Lasheeena Sipp-Lipscomb

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EX. No	DATE	DESCRIPTION
128		Patient Education and Discharge Summaries
129	09/17/19	Pre-Litigation correspondence w- St. Chris and its counsel Gary Samms
130		Voicemail of audio file
131		Voicemail transcription
132	09/19/19	Completed Records ANDRES M. GARDIN
133	09/19/19	CDR Andres Gardin
134	08/31/20	2823227 Certification
135		UTC Information Sheet 05252018
136		Interpreting Call Detail Records - 02252020
137	07/15/20	2823227 _8068564 _2673108421 _CDRT
138	11/05/19	DHS Statement of Claim - \$2,967.73
139	04/14/20	DHS Letter re Statement of Claim
140	12/18/20	Emailed Photographs from Lasheena
141	07/14/19	Police Incident Report
<b>ADDITIONAL DOCUMENTS</b>		
142	07/26/21	Responses of St. Chris to Kalyampur's RPD
143	06/26/21	Errata Sheet of Eric Cho
144	07/03/20	Correspondence from Police Dept enclosing incident history detail and audio file
145	07/24/19	Police Radio Tape
146	07/24/19	B&R Dispatch Transcription of 911 Recording
147		A Systematic Review of Testicle Survival Time
		Plaintiffs reserve the right to use all documents filed of record and all documents designated as Exhibits by any of the Defendants (without waiving objections to any of Defendants' documents).

**CERTIFICATE OF SERVICE**

I, DAVID E. JOKELSON, hereby certify that on November 1, 2022, a true and correct copy of Plaintiffs' Amended Exhibit List was served *via* the Court's ECF System upon the following:

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